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REMARKS

This is a full and timely response to the outstanding Office action mailed December 29, 2005. Claims 1-74 are pending.

I. Present Status of Patent Application

Claims 1-4, 19, 20, 22, 23, 24, 62, 63, 64, 65, 67-69, 72, and 74 are rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by Rodriguez *et al.* (U. S. Patent Publication No. 2005/0071882). Claim 5 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Haddad (U.S. Patent No. 5,555,441) in view of Hooper *et al.* (U.S. Patent No. 5,414,455). Claim 6 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Haddad in view of Greenwood *et al.* (U.S. Patent No. 5,568,181). Claim 7-18, 21, 26-50 and 53-61 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Haddad in view of Hassell *et al.* (U.S. Patent Publication No. 2004/0128685) and further in view of Seazholtz *et al.* (U.S. Patent No. 5,812,786). Claim 25 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Haddad in view of Hassell in view of Seazholtz, in view of Kitsukawa *et al.* (U.S. Patent Publication No. 2001/0013125). Claims 51 and 52 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Haddad in view of Hassell in view of Seazholtz, in view of Okamoto *et al.* (U.S. Patent No. 6,901,385). Claim 66 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Haddad in view of Wahl (U.S. Patent No. 5,898,456). Claim 70 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Haddad. Claim 71 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Haddad in view of Okamoto *et al.* Claim 73 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Haddad in view of Seazholtz. These rejections are respectfully traversed.

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II. Previously Submitted Affidavit

An affidavit was submitted in the previous response declaring that Arturo Rodriguez was a co-inventor of subject matter in the instant application and a patent used as a reference in a rejection. This affidavit only spoke to the participation of Mr. Rodriguez as a co-inventor and did not claim that he was a sole inventor of any subject matter. The affidavit was submitted in response to an avenue offered in the Office Action mailed June 23, 2005. The latest Office Action avers that this affidavit introduces inventorship issues with one or both applications. However, Applicant respectfully submits that there is no inventorship issue with either application. As the two applications clearly claim different subject matter, no inventorship issues arise.

III. Rejections of Claims 15, 16, 17, and 18

Claims 15, 16, 17, and 18 are objected to based upon indefiniteness. Applicant respectfully traverses this rejection. Applicant submits that the objection is based on language that was deleted from the claim through amendment. In the amendment, "during off reposessed unused bandwidth use" (as objected to in the previous Office Action) was amended to "using reallocated excess on demand infrastructure capacity." This amended language does not appear to have received an examination, as the Office Action only references the language present before the amendment. Therefore Applicant respectfully submits that the objection, and the corresponding rejection of these claims for language that was deleted in a properly entered amendment, is improper and should be withdrawn. As these claims have not received a second examination on their merits, the final status for this Office Action should be changed to non-final.

II. Rejections Under 35 U.S.C. §102(b)

A. Claims 1-4, 19, 20, 22-24, and 62

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The Office Action rejects claims 1-4, 19, 20, 22-24, and 62 are rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by *Rodriguez* (U. S. Patent Publication No. 2005/0071882), and alternatively by *Haddad*. For the reasons set forth below, Applicant respectfully traverses the rejection.

Independent claim 1 recites:

1. A recordable media content purchasing system comprising:
a first memory; and
a first processor configured with the first memory to download recordable media content at one of a plurality of various download times for purchase of the recordable media content, wherein the processor uses reallocated excess on-demand infrastructure capacity.

(Emphasis added).

For a proper rejection of a claim under 35 U.S.C. §102, the cited reference must disclose, teach, or suggest all elements/features/steps of the claim at issue. *See, e.g., E.I. du Pont de Nemours & Co. v. Phillips Petroleum Co.*, 849 F.2d 1430, 7 U.S.P.Q.2d 1129 (Fed. Cir. 1988).

Applicant respectfully submits that independent claim 1 is allowable for at least the reason that *Rodriguez* does not disclose, teach, or suggest at least **a first processor configured with the first memory to download recordable media content at one of a plurality of various download times for purchase of the recordable media content**.

Even if *Rodriguez* discloses a video on demand system, it does not disclose recordable media content. The Office Action has cited paragraphs 7, 36, 38, 39, 47, 48, 52, 53, 61, and 62 as allegedly disclosing a system for downloading recordable media content at various times.

Even if paragraph [0007] teaches a non-real time throttling mechanism over a set of logical data channels (the Viswanathan method), it fails to teach downloading recordable media content.

Even if paragraph [0036] of *Rodriguez* teaches the saving of information concerning the media content, it does not record the media content that is purchased. Additionally, the memory

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disclosed in paragraph [0038] of *Rodriguez* is for system operations (decompressing video) as described in detail in paragraph [0039], not for recording a media instance for playback at a later time.

Even if paragraphs 47, 48, 52, 61, and 62 teach the scheduling of the downloading of on demand video, there is not a teaching of recording the downloaded content that is purchased, nor is there a teaching that the downloaded content is recordable. Likewise, even if paragraph 53 discloses fees for different download times, it does not disclose the downloading of recordable media content; no recording is disclosed. Applicant respectfully asserts that the *Rodriguez* reference, when viewed as a whole, discloses real-time video on demand services and does not teach recordable media content.

Additionally, Applicant respectfully submits that independent claim 1 is allowable for at least the reason that *Haddad* does not disclose, teach, or suggest the processor uses reallocated excess on-demand infrastructure capacity. Even if, arguendo, *Haddad* teaches a system that is capable of distributing multimedia data at various times, such as off-peak hours to more efficiently utilize the system hardware, *Haddad* does not disclose relocating excess on demand infrastructure capacity. As one of ordinary skill in the art would recognize, the reallocation of excess on demand infrastructure capacity includes an initial allocation, a determination of excess capacity, and then a reallocation of the excess capacity. An initial allocation does not, by itself, reallocate an excess of on-demand infrastructure capacity. Therefore, neither *Rodriguez* nor *Haddad* anticipates claim 1, and the rejection should be withdrawn.

Because independent claim 1 is allowable over the cited references of record, dependent claims 2-4, 19, 20, 22-24, and 62 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that dependent claims 2-4, 19, 20, 22-24, and 62 contain all the steps/features of independent claim 1. See *Minnesota Mining and Manufacturing Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002); *Jeneric/Pentron, Inc. v. Dillon Co.*, 205 F.3d 1377, 54 U.S.P.Q.2d 1086 (Fed. Cir. 2000); *Wahpeton Canvas Co. v. Frontier Inc.*, 870 F.2d 1546, 10 U.S.P.Q.2d 1201 (Fed. Cir. 1989). Therefore, since dependent claims 2-4, 19, 20, 22-24, and 62 are patentable over *Haddad*, the rejection to claims 2-4, 19, 20, 22-24, and 62 should be withdrawn and the claims allowed.

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Additionally and notwithstanding the foregoing reasons for allowability of independent claim 1, dependent claims 2-4, 19, 20, 22-24, and 62 recite further features and/or combinations of features, as are apparent by examination of the claims themselves, that are patently distinct from the cited art of record. Hence there are other reasons why dependent claims 2-4, 19, 20, 22-24, and 62 are allowable.

B. Claims 63-65, 67-69, and 72-74

The Office Action rejects claims 63-65, 67-69, and 72-74 are rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by *Rodriguez* (U. S. Patent Publication No. 2005/0071882) and alternatively by *Haddad*. For the reasons set forth below, Applicant respectfully traverses the rejection.

Independent claim 63 recites:

63. A recordable media content purchasing method comprising the steps of:
receiving a user request for purchase of recordable media content; and
downloading the requested recordable media content at one of a plurality of various download times for purchase of the recordable media content, including during reallocated excess on-demand infrastructure capacity.

(Emphasis Added)

For a proper rejection of a claim under 35 U.S.C. §102, the cited reference must disclose, teach, or suggest all elements/features/steps of the claim at issue.

Applicant respectfully submits that independent claim 63 is allowable for at least the reason that *Rodriguez* does not disclose, teach, or suggest at least ***downloading the requested recordable media content at one of a plurality of various download times for purchase of the recordable media content.***

Even if *Rodriguez* discloses a video on demand system, it does not disclose recordable media content. The Office Action has cited paragraphs 7, 36, 38, 39, 47, 48, 52, 53, 61, and 62 as allegedly disclosing a system for downloading recordable media content at various times.

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Even if paragraph [0007] teaches a non-real time throttling mechanism over a set of logical data channels (the Viswanathan method), it fails to teach downloading recordable media content.

Even if paragraph [0036] of *Rodriguez* teaches the saving of information concerning the media content, it does not record the media content that is purchased. Additionally, the memory disclosed in paragraph [0038] of *Rodriguez* is for system operations (decompressing video) as described in detail in paragraph [0039], not for recording a media instance for playback at a later time.

Even if paragraphs 47, 48, 52, 61, and 62 teach the scheduling of the downloading of on demand video, there is not a teaching of recording the downloaded content that is purchased, nor is there a teaching that the downloaded content is recordable. Likewise, even if paragraph 53 discloses fees for different download times, it does not disclose the downloading of recordable media content; no recording is disclosed. Applicant respectfully asserts that the *Rodriguez* reference, when viewed as a whole, discloses real-time video on demand services and does not teach recordable media content.

Additionally, Applicant respectfully submits that independent claim 63 is allowable for at least the reason that *Haddad* does not disclose, teach, or suggest **during reallocated excess on-demand infrastructure capacity**. Even if, arguendo, *Haddad* teaches a system that is capable of distributing multimedia data at various times, such as off-peak hours to more efficiently utilize the system hardware, *Haddad* does not disclose relocating excess on demand infrastructure capacity. As one of ordinary skill in the art would recognize, the reallocation of excess on demand infrastructure capacity includes an initial allocation, a determination of excess capacity, and then a reallocation of the excess capacity. An initial allocation does not, by itself, reallocate an excess of on-demand infrastructure capacity. Therefore, neither *Rodriguez* nor *Haddad* anticipates claim 1, and the rejection should be withdrawn.

Regarding claim 69, the Office Action avers that it is inherent a user would be able to download content with latency because they can select a later date at which to download the program. Applicant respectfully traverses this assertion. "Anticipation by inherency requires that 1) the missing descriptive matter be 'necessarily present' in the prior art reference ..."

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Continental Can Co. v. Monsanto Co., 948 F.2d 1264 (Fed. Cir. 1991). Applicant respectfully submits that features that the Office Action concludes as inherent are not necessarily present in the prior art reference and are, therefore, in fact, not inherent. To wit, the calendar can be used to view the times that the download would be cheapest. The user could return at that time to download the content. Therefore, the latency feature is not inherent to the calendar.

Because independent claim 63 is allowable over the cited references of record, dependent claims 63-65, 67-69, and 72-74 (which depend from independent claim 63) are allowable as a matter of law for at least the reason that dependent claims 63-65, 67-69, and 72-74 contain all the steps/features of independent claim 63. Therefore, since dependent claims 63-65, 67-69, and 72-74 are patentable over *Haddad*, the rejection to claims 63-65, 67-69, and 72-74 should be withdrawn and the claims allowed.

Additionally and notwithstanding the foregoing reasons for allowability of independent claim 63, dependent claims 63-65, 67-69, and 72-74 recite further features and/or combinations of features, as are apparent by examination of the claims themselves, that are patently distinct from the cited art of record. Hence there are other reasons why dependent claims 63-65, 67-69, and 72-74 are allowable.

III. Rejections Under 35 U.S.C. §103(a)

A. Claims 5-18, 21, and 25-61

The Office Action rejects claim 5 under 35 U.S.C. §103(a) as allegedly being unpatentable over *Haddad* (U.S. Patent No. 5,555,441) in view of *Hooper* (U.S. Patent No. 5,414,455). Claim 6-18, 21, 26-61 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Haddad* in view of *Greenwood* (U.S. Patent No. 5,568,181) further in view of *Hassell* (U.S. Patent Publication No. 2004/0128685) and further in view of *Seazholtz* (U.S. Patent No. 5,812,786). Claim 25 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Haddad* in view of *Hassell* and further in view of *Seazholtz* as applied to claim 7 above, and further in view of *Kitsukawa* (U.S. Patent Publication No. 2001/0013125).

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Because independent claim 1 is allowable over the cited art of record, dependent claims 5-18, 21, and 25-61 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that dependent claims 5-18, 21, and 25-61 contain all the steps/features of independent claim 1. Therefore, the rejection to claims 5-18, 21, and 25-61 should be withdrawn and the claims allowed.

Regarding claim 7, the Office action has included a conclusion that "at the time of Applicant's invention, the use of buffers was well known in the art of telecommunications." See *Office Action*, page 10. Applicant traverses this finding that the subject matter is well known. Particularly in the context of the claimed combination that includes a processor configured with memory to download recordable media content at one of a plurality of various download times for purchase of the recordable media content, wherein the processor uses reallocated excess on-demand infrastructure capacity, the subject matter alleged to be well-known is too complex for a reasonably skilled person to consider it to be well-known to the point that no additional evidence is needed. Additionally, an assertion that an element, by itself, is well known is insufficient to form a rejection. To be the basis of a rejection, the element must be well known in combination with each and every element of the claim. To hold otherwise would abolish the combination of elements concept. To wit, "the question is not simply whether the prior art 'teaches' the particular element of the invention, but whether it would 'suggest the desirability, and thus the obviousness, of making the combination.'" *ALCO Standard Corp. v. Tennessee Valley Authority*, 808 F.2d 1490, 1498 (Fed. Cir. 1986). Therefore, the conclusion that the element in combination with all the elements in the claim is well known is improper and should be withdrawn.

Regarding claims 12, 17 and 18, the Office action has included a conclusion that "it was notoriously known in the art at the time of applicant's invention to charge less for extended download times." See *Office Action*, page 14. Applicant traverses this finding that the subject matter is notoriously known. Particularly in the context of the claimed combination that includes a processor configured with memory to download recordable media content at one of a plurality of various download times for purchase of the recordable media content, wherein the processor uses reallocated excess on-demand infrastructure capacity, the subject matter alleged to be well-known is too complex for a reasonably skilled person to consider it to be well-known to the point

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that no additional evidence is needed. Additionally, an assertion that an element, by itself, is well known is insufficient to form a rejection. To be the basis of a rejection, the element must be well known in combination with each and every element of the claim. To hold otherwise would abolish the combination of elements concept. To wit, "the question is not simply whether the prior art 'teaches' the particular element of the invention, but whether it would 'suggest the desirability, and thus the obviousness, of making the combination.'" *ALCO Standard Corp. v. Tennessee Valley Authority*, 808 F.2d 1490, 1498 (Fed. Cir. 1986).

The notoriously known assertion was backed by an assertion that U.S. Pat. No. 6,631,413 to Aggarwal provides that this feature is notoriously known. Applicant respectfully submits that the alleged teaching of an element in a patent reference does not in itself provide that that element is notoriously known. If the converse were true, every element found in a patent reference could be considered to be well known. Certainly, this is not the case. Therefore, the conclusion that the element in combination with all the elements in the claim is well known is improper and should be withdrawn.

Regarding claim 21, the Office action has included a conclusion that "it was notoriously known in the art at the time of applicant's invention to store new releases in video servers." *See Office Action*, page 14. Applicant traverses this finding that the subject matter is notoriously known. Particularly in the context of the claimed combination that includes a processor configured with memory to download recordable media content at one of a plurality of various download times for purchase of the recordable media content, wherein the processor uses reallocated excess on-demand infrastructure capacity, the subject matter alleged to be well-known is too complex for a reasonably skilled person to consider it to be well-known to the point that no additional evidence is needed. Additionally, an assertion that an element, by itself, is well known is insufficient to form a rejection. To be the basis of a rejection, the element must be well known in combination with each and every element of the claim. To hold otherwise would abolish the combination of elements concept. To wit, "the question is not simply whether the prior art 'teaches' the particular element of the invention, but whether it would 'suggest the desirability, and thus the obviousness, of making the combination.'" *ALCO Standard Corp. v. Tennessee Valley Authority*, 808 F.2d 1490, 1498 (Fed. Cir. 1986). Therefore, the conclusion that

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the element in combination with all the elements in the claim is well known is improper and should be withdrawn.

Regarding claims 40 and 49, the Office action has included a conclusion that "it was notoriously known in the art at the time of applicant's invention to provide the user with on-screen options to purchase media." *See Office Action*, pages 17 and 20. Applicant traverses this finding that the subject matter is notoriously known. Particularly in the context of the claimed combination that includes a processor configured with memory to download recordable media content at one of a plurality of various download times for purchase of the recordable media content, wherein the processor uses reallocated excess on-demand infrastructure capacity, the subject matter alleged to be well-known is too complex for a reasonably skilled person to consider it to be well-known to the point that no additional evidence is needed. Additionally, an assertion that an element, by itself, is well known is insufficient to form a rejection. To be the basis of a rejection, the element must be well known in combination with each and every element of the claim. To hold otherwise would abolish the combination of elements concept. To wit, "the question is not simply whether the prior art 'teaches' the particular element of the invention, but whether it would 'suggest the desirability, and thus the obviousness, of making the combination.'" *ALCO Standard Corp. v. Tennessee Valley Authority*, 808 F.2d 1490, 1498 (Fed. Cir. 1986).

The notoriously known assertion was backed by an assertion that U.S. Pat. No. 5,850,218 to LaJoie provides that this feature is notoriously known. Applicant respectfully submits that the alleged teaching of an element in a patent reference does not in itself provide that that element is notoriously known. If the converse were true, every element found in a patent reference could be considered to be well known. Certainly, this is not the case. Therefore, the conclusion that the element in combination with all the elements in the claim is well known is improper and should be withdrawn.

Regarding claims 45 and 47, the Office action has included a conclusion that "it was notoriously known in the art at the time of applicant's invention to use icons in electronic programming guides." *See Office Action*, pages 18 and 19. Applicant traverses this finding that the subject matter is notoriously known. Particularly in the context of the claimed combination

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that includes a processor configured with memory to download recordable media content at one of a plurality of various download times for purchase of the recordable media content, wherein the processor uses reallocated excess on-demand infrastructure capacity, the subject matter alleged to be well-known is too complex for a reasonably skilled person to consider it to be well-known to the point that no additional evidence is needed. Additionally, an assertion that an element, by itself, is well known is insufficient to form a rejection. To be the basis of a rejection, the element must be well known in combination with each and every element of the claim. To hold otherwise would abolish the combination of elements concept. To wit, "the question is not simply whether the prior art 'teaches' the particular element of the invention, but whether it would 'suggest the desirability, and thus the obviousness, of making the combination.'" *ALCO Standard Corp. v. Tennessee Valley Authority*, 808 F.2d 1490, 1498 (Fed. Cir. 1986).

The notoriously known assertion was backed by an assertion that U.S. Pat. No. 5,850,218 to LaJoie provides that this feature is notoriously known. Applicant respectfully submits that the alleged teaching of an element in a patent reference does not in itself provide that that element is notoriously known. If the converse were true, every element found in a patent reference could be considered to be well known. Certainly, this is not the case. Therefore, the conclusion that the element in combination with all the elements in the claim is well known is improper and should be withdrawn.

Regarding claim 61, the Office action has included a conclusion that "it was notoriously known in the art at the time of applicant's invention to debit consumer's accounts for various transactions." See *Office Action*, page 22. Applicant traverses this finding that the subject matter is notoriously known. Particularly in the context of the claimed combination that includes a processor configured with memory to download recordable media content at one of a plurality of various download times for purchase of the recordable media content, wherein the processor uses reallocated excess on-demand infrastructure capacity, the subject matter alleged to be well-known is too complex for a reasonably skilled person to consider it to be well-known to the point that no additional evidence is needed. Additionally, an assertion that an element, by itself, is well known is insufficient to form a rejection. To be the basis of a rejection, the element must be well known in combination with each and every element of the claim. To hold otherwise would

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abolish the combination of elements concept. To wit, "the question is not simply whether the prior art 'teaches' the particular element of the invention, but whether it would 'suggest the desirability, and thus the obviousness, of making the combination.'" *ALCO Standard Corp. v. Tennessee Valley Authority*, 808 F.2d 1490, 1498 (Fed. Cir. 1986).

The notoriously known assertion was backed by an assertion that U.S. Pat. No. 5,329,590 to Pond provides that this feature is notoriously known. Applicant respectfully submits that the alleged teaching of an element in a patent reference does not in itself provide that that element is notoriously known. If the converse were true, every element found in a patent reference could be considered to be well known. Certainly, this is not the case. Therefore, the conclusion that the element in combination with all the elements in the claim is well known is improper and should be withdrawn.

Additionally and notwithstanding the foregoing reasons for allowability of independent claim 1, dependent claims 5-18, 21, and 25-61 recite further features and/or combinations of features, as are apparent by examination of the claims themselves, that are patently distinct from the cited art of record. Hence there are other reasons why dependent claims 5-18, 21, and 25-61 are allowable.

B. Claims 66 and 70

Claim 66 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Haddad* in view of *Wahl* (U.S. Patent No. 5,898,456). Claim 70 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Haddad*.

Because independent claim 63 is allowable over the cited art of record, dependent claims 66 and 70 (which depend from independent claim 63) are allowable as a matter of law for at least the reason that dependent claims 66 and 70 contain all the steps/features of independent claim 63. Therefore, the rejection to claims 66 and 70 should be withdrawn and the claims allowed.

Additionally and notwithstanding the foregoing reasons for allowability of independent claim 63, dependent claims 66 and 70 recite further features and/or combinations of features, as are apparent by examination of the claims themselves, that are patently distinct from the cited art of record. Hence there are other reasons why dependent claims 66 and 70 are allowable.

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IV

Miscellaneous Issues

Any other statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Furthermore, any and all findings of well-known art and official notice, or statements interpreted similarly, should not be considered well known for at least the specific and particular reason that the Office Action does not include specific factual findings predicated on sound technical and scientific reasoning to support such conclusions.

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CONCLUSION

For at least the reasons set forth above, Applicant respectfully submits that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims 1-74 are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,



Benjamin Balser, Reg. No. 58,169

**THOMAS, KAYDEN,
HORSTEMEYER & RISLEY, L.L.P.**
Suite 1750
100 Galleria Parkway N.W.
Atlanta, Georgia 30339
(770) 933-9500